

UNITED STATES DISTRICT COURT  
FOR THE  
SOUTHERN DISTRICT OF CALIFORNIA

**Petition for Warrant for Defendant on Pretrial Release**

**Name of Defendant:** KOWNACKI, DANIELLE TRNITTI

**Dkt No.:** 14CR3668JLS-001

**Reg. No.:** 48749-298

**Name of Judicial Officer:** The Honorable Janis L. Sammartino, U.S. District Judge  
(Matter referred to Nita L. Storms for Jan M. Adler U.S. Magistrate Judge)

**Date Conditions Ordered:** December 9, 2014, before the Honorable Jan M. Adler, U.S. Magistrate Judge

**Charged Offense:** Title 21, U.S.C., Secs. 952 and 960 - Importation of Heroin and Methamphetamine

**Conditions of Release:** Restrict travel to the Southern and Central Districts of California; report for supervision to Pretrial Services Agency (PSA) as directed by the assigned Pretrial Services Officer and pay for the reasonable costs of supervision in an amount determined by PSA and approved by the Court; not possess or use any narcotic drug or other controlled substance as defined in 21 U.S.C. § 802, without a lawful medical prescription; not possess any firearm or other dangerous weapon or explosive device; read, or have explained, and acknowledge understanding of the Advice of Penalties and Sanctions Forms; provide the court a current residence address and telephone number prior to release from custody and keep it current while the case is pending, submit to treatment, and/or testing, as specified by the PSO, actively seek and maintain full-time employment/schooling or combination of both, clear all warrants/FTAs and pay all fines within 30 days of release; surrender any valid passport and may not apply for new travel documents, defendant to enter an inpatient or outpatient drug treatment program as directed by Pretrial Services, upon completion of drug treatment defendant is to reside with parents or at a residence approved by Pretrial Services.

**Modification:** None

**Date Released on Bond:** December 23, 2014

**Next Court Hearing:** June 26, 2015, at 9:00 a.m., for Sentencing

**Asst. U.S. Atty.:** Ryan Sausedo  
(619) 546-9689

**Defense Counsel:** John Kirby (Appointed)  
(619) 557-1000

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**Prior Violation History:** None

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### PETITIONING THE COURT

#### TO ISSUE A NO-BAIL BENCH WARRANT

The Pretrial Services officer believes that the defendant has violated the following condition(s) of pretrial release:

<b><u>CONDITION(S)</u></b>	<b><u>ALLEGATION(S) OF NONCOMPLIANCE</u></b>
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**(Standard/Special Condition)**

Enter an inpatient or outpatient drug treatment program as directed by Pretrial Services.

1. On June 18, 2015, the defendant was terminated from a residential drug treatment program, CRASH Inc., for violation of the program's rules.

**Grounds for Revocation:**

On this date, the undersigned received a call from CRASH, reporting Ms. Kownacki was refusing to provide a urine specimen as directed by the program, but eventually did. Ms. Kownacki then attempted to leave the program but agreed to stay in order to speak to a counselor. CRASH, Inc., reports Ms. Kownacki admitted to using an illicit substance on June 17, 2015, and she also advised she brought about half gram of this substance into the drug treatment program. For these reasons Ms. Kownacki was terminated from the program.

The undersigned and defense counsel attempted to facilitate her placement into her parent's home or another approved location. Her attorney advised he would bring Ms. Kwonacki to our office for further discussions but she ran from him as they approached the Carter/Keep Federal Courthouse.

At this time, her current location remains unknown and her parents (sureties) are aware of her departure.

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**SUPERVISION ADJUSTMENT**

The defendant has been on bond since December 23, 2015. She has been in a residential drug treatment program, CRASH, Inc., since that time. Ms. Kownacki was doing well in the drug program and was due to complete it on June 26, 2015.

Criminal computerized record checks reveal no new arrests were found.

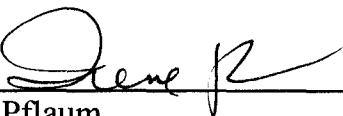
**RECOMMENDATION/JUSTIFICATION**

In light of the information being provided to the Court, we recommend a no bail warrant be issued for the defendant's arrest so she may be brought before the Court and show cause why her bond should not be revoked.

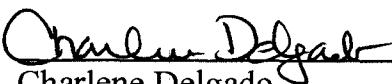
**I declare under penalty of perjury that the foregoing is true and correct.**

Executed on: 6/18/2015

Respectfully submitted:  
LORI A. GAROFALO  
CHIEF PRETRIAL SERVICES OFFICER

by   
Irene Pflaum  
U.S. Pretrial Services Officer  
(619) 557-6056  
Place: San Diego, California

Reviewed and approved:

  
Charlene Delgado  
Supervising U.S. Pretrial Services Officer

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**THE COURT ORDERS:**

AGREE, ISSUE A NO BAIL BENCH WARRANT FOR THE DEFENDANT'S ARREST AND ORDER HER TO SHOW CAUSE WHY HER BOND SHOULD NOT BE REVOKED.

Other \_\_\_\_\_



The Honorable Nita L. Stormes for Jan M. Adler  
U.S. Magistrate Judge

6-18-15

Date